

From: Minkey, David M - DNR <David.Minkey@wisconsin.gov>
Sent: Thursday, March 5, 2015 9:06 AM
To: Nessmann, Mark <Mark.Nessmann@experaspecialty.com>
Cc: Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>
Subject: RE: Expera Thilmany mill draft construction permit comments

Mark,

I believe Carol wrote the MACT section of the permit in the last six months or so. She's out today, but I will check with her to make sure when she returns. As for the other two comments you added to, my thoughts are in purple below. Regarding public noticing, a few years back our program changed its policy and now DNR always does the public noticing. The process has gotten quicker too since we publish in only the Wisconsin State Journal and on the internet and don't deal with the slower turnaround of some of the local newspapers. Let me know if we're good to go with the updated draft permit I sent you yesterday, with the change noted below. Thanks.

7. Page 7, after condition A.6.a.(4): "We need a section here that talks about the ability to get a higher limit by using output based limits with a combination of steam and electrical output per IBMACT and ability to qualify for credits due to energy efficiency projects completed. Site federal citation and state we can apply to DNR to get those limits based on what we submit at a later date but prior to 1/31/17 What would be the process to select a methodology and then change that at a later date? Do we need a process for changing which limit we comply with or just inform DNR as we go along?"

Provisions related to output-based limits and energy efficiency allowances are included in sections AAA.8., 11. and 14. As for the methodology for changing limits at a later date, I asked our boiler MACT expert Tom Zelinski and this was his response: "I believe that change is doable. They would likely need to coordinate the change so that all the requirements for a output-based limit are met before they would discontinue their monitoring for the input-based limit. There may be a transition time involved. Certainly different site-specific plans are required. If the change includes the use of an alternative monitoring parameter, the EPA would need to approve the use of the alternative monitoring parameter (See 40 CFR 63.7505(d))." If you want to discuss this more with Tom, he can be reached at (414) 263-8577. So do we need to add some language in the construction permit to the effect that permittee can switch compliance methods provided ...?

I think getting into specifics about how these types of changes will be made is premature. The MACT conditions in this construction permit are meant to be a snapshot of the entire MACT at this time. After you've modified the boilers, done your testing, and decided on limitations, compliance demonstrations, monitoring, etc., we will revise your operation permit and tailor the MACT conditions to be specific to your facility. These types of issues can be addressed in that permit.

13. Page 27, section AAA.8.: "Need some clarification here – as the rule originally reads its not clear we can emission average due to having boilers in two categories however EPA has provided further clarification outside the original rule that says emission averaging across categories can be used when going to common stack.

This would be something to discuss with Tom Zelinski and the compliance inspector Michelle Farley. What is in the permit now is what is in the current rule. As you know, the MACT is under reconsideration, so any changes to the rule will be reflected in the revised operation permit that DNR will issue to incorporate this construction permit after the boiler MACT takes effect. I would like to see

the emission average limit in the permit – then its clear. With all three boilers in one stack weighted average by heat input capacity is 0.039 lb/mmBtu heat input times I believe 0.9 . This only impacts the PM limit because the limits for HCl and Hg are the same for different subcategories. If we don't state the emission averaged limit it is going to get very confusing and cause problems somewhere down the road.

See my response to comment 7. Above. However, I did add conditions A.6.a.(5) and B.7.a.(5), "The permittee may use emissions averaging, contained in sections AAA.8. and 14. of this permit, to meet the PM (or TSM), HCl, and mercury limits. [40 CFR 63.7522 and 63.7541; 14-DMM-191]", to make that option more clear.

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Dave Minkey

Phone: (920) 662-5179

David.Minkey@wisconsin.gov

From: Nessmann, Mark [<mailto:Mark.Nessmann@experaspecialty.com>]
Sent: Wednesday, March 04, 2015 4:13 PM
To: Minkey, David M - DNR
Cc: Farley, Michelle M - DNR
Subject: RE: Expera Thilmany mill draft construction permit comments

Dave

This mostly looks good – we may still comment on a few of the items after public noticed but that's ok. As far as cutting and pasting the federal rule make sure to use the latest version. When the "final" version was published 1/31/13 there were a lot of details missing. The placeholders were there and then over time they started adding in those details so the current electronic version from eCFR looks different than the original published rule in the FR. Looks like you are not using the original published version but make sure its up to date.

I have a couple questions based on your responses below in red.

Whats quicker – DNR publish the public notice or we do?

Mark Nessmann
Environmental Manager

Expera Specialty Solutions
600 Thilmany Road Kaukauna, WI 54130
P 920-766-8235 / C 920-328-3308
mark.nessmann@experaspecialty.com
[makingbigideasfly](#)
experaspecialty.com

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